

NPDES Permit No. IL0000299
Notice No. BWC:15042301bwc.docx

Public Notice Beginning Date: **July 15, 2015**

Public Notice Ending Date: **August 14, 2015**

National Pollutant Discharge Elimination System (NPDES)
Permit Program

Draft Reissued NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency
Bureau of Water,
Division of Water Pollution Control
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-0610

Name and Address of Discharger:

Illinois-American Water Company
100 North Water Works Drive
Belleville, Illinois 62263

Name and Address of Facility:

Illinois-American Water Company
Alton District
1200 West Broadway
Alton, Illinois 62002
(Madison County)

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue a NPDES permit to discharge into the waters of the state and has prepared a draft permit and associated fact sheet for the above named discharger. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice/Fact Sheet. The last day comments will be received will be on the Public Notice period ending date unless a commentor demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the draft permit to the IEPA at the above address. Commentors shall provide his or her name and address and the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues. Commentors may include a request for public hearing. Persons submitting comments and/or requests for public hearing shall also send a copy of such comments or requests to the permit applicant. The NPDES permit and notice number(s) must appear on each comment page.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 45 days before any public hearing. Response to comments will be provided when the final permit is issued. For further information, please call Brian W. Cox at 217/782-0610.

The applicant is engaged in the operation of a potable water treatment plant which treats water pumped from the Mississippi River to produce potable water for sale for domestic, commercial and industrial uses (SIC 4941). Plant operation results in an average discharge of 0.76 MGD of superpulvator sludge blowdown, superpulvator cleaning waste and filter backwash from Outfall 002.

Wastewater is dechlorinated prior to discharge.

The following modifications are proposed:

Outfall 001 has been removed from the permit. Outfall 001 received discharges from the old water treatment plant which has been removed from service.

The Illinois Pollution Control Board (IPCB) adopted Adjusted Standard AS 07-2 on October 18, 2007. The effects and requirements of IPCB AS 07-2 have been incorporated into the special conditions of the permit.

Manganese limitations have been added to the permit to incorporate the Title 35 Ill. Adm. Code 304.124 effluent standards for manganese. The manganese limits have been added to the permit based on data submitted to the Agency by the permittee indicating

that several samples have exceeded the manganese standards for Title 35 Ill. Adm. Code 304.124.

The pH limitations have been updated to reflect the water quality standard found at 35 IAC 302.204.

Application is made for the existing discharge which is located in Madison County, Illinois. The following information identifies the discharge point, receiving stream and stream classifications:

Outfall	Receiving Stream	Latitude		Longitude		Stream Classification	Stream Integrity Rating
002	Mississippi River	38° 53' 59"	North	90° 12' 16"	West	General Use	Not Rated

The stream segment, J-05, of the Mississippi River, receiving the discharge from Outfall(s) 002 is on the 2014 303(d) list of impaired water, and is not identified as a biologically significant stream and was not given a Biological Stream Integrity Rating in the 2008 Illinois Department of Natural Resources Publication – *Integrating Multiple Taxa in a Biological Stream Rating System*. The following parameters have been identified as the pollutants causing impairment:

Outfall(s)	Designated Uses	Potential Causes
002	Fish Consumption	Mercury and PCBs
002	Primary Contact Recreation	Fecal Coliform

To assist you further in identifying the location of the discharge please see the attached map.



The discharge(s) from the facility shall be monitored and limited at all times as follows:

Outfalls: 002 Water Treatment Wastes (DAF = 0.76 MGD)

	LOAD LIMITS lbs/day			CONCENTRATION		
	DAF (DMF)			LIMITS mg/l		
PARAMETER	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION	30 DAY AVERAGE	DAILY MAXIMUM	REGULATION
Flow (MGD)						
pH				Shall be in the range of 6.5 to 9 s.u.		35 IAC 302.204
Total Suspended Solids					Monitor Only	IPCB AS 07-2
Iron (Total)					Monitor Only	IPCB AS 07-2
Total Residual Chlorine					0.05	40 CFR 125.3
Manganese				1.0	2.0	35 IAC 304.124

The following explain the conditions of the proposed permit:

The special conditions clarify Total Suspended Solids (TSS) and Total Iron monitoring requirements. The discharge at Outfall 002 will not be subject to the 35 IAC 304.124 effluent standards for TSS and Total Iron or the offensive discharge standard of 35 IAC 304.106, in accordance with Illinois Pollution Control Board (IPCB) Adjusted Standard AS-07-2. The permittee shall comply with all requirements contained within IPCB AS-07-2. The special conditions also clarify flow monitoring requirements, pH limitations, TRC limitations, monitoring location requirements, discharge monitoring report (DMR) submission requirements, and reopener conditions.

NPDES Permit No. IL0000299

Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date:

Issue Date:

Effective Date:

Name and Address of Permittee:

Facility Name and Address:

Illinois-American Water Company
100 North Water Works Drive
Belleville, Illinois 62263

Illinois-American Water Company
Alton District
1200 West Broadway
Alton, Illinois 62002
(Madison County)

Discharge Number and Name:

Receiving Waters:

002 Water Treatment Wastes

Mississippi River

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.

Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

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Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfalls: 002 - Water Treatment Wastes (DAF = 0.76 MGD)

This discharge consists of:	Average Flow:
1. Superpulsator Blowdown	0.3 MGD
2. Filter Backwash	0.4 MGD
3. Superpulsator Cleaning	0.06 MGD

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Flow (MGD)	See Special Condition 1				Continuous	Measurement
pH	See Special Condition 2				1/Month	Grab
Total Suspended Solids	See Special Conditions 9 and 10				1/Month	Grab
Iron (Total)	See Special Conditions 9 and 10				1/Month	Grab
Total Residual Chlorine				0.05*	1/Month	Grab
Manganese			1.0	2.0	1/Month	Grab

*See Special Condition 6

Special Conditions

SPECIAL CONDITION 1. Flow shall be measured in units of Million Gallons per Day (MGD) and reported as a monthly average and a daily maximum on the Discharge Monitoring Report. The monthly average shall consist of the summation of the daily flows divided by the number of days the facility discharged during that month.

SPECIAL CONDITION 2. The pH shall be in the range 6.5 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

SPECIAL CONDITION 3. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

SPECIAL CONDITION 4. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) Forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (NetDMRs) instead of mailing paper DMRs to the IEPA. More information, including registration information for the NetDMR program, can be obtained on the IEPA website, <http://www.epa.state.il.us/water/net-dmr/index.html>.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using NetDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
Attention: Compliance Assurance Section, Mail Code # 19

SPECIAL CONDITION 5. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

SPECIAL CONDITION 6. All samples for Total Residual Chlorine shall be analyzed by an applicable method contained in 40 CFR 136, equivalent in accuracy to low-level amperometric titration. Any analytical variability of the method used shall be considered when determining the accuracy and precision of the results obtained.

For the purpose of this permit Total Residual Chlorine means those substances which include combined and uncombined forms of both chlorine and bromine and which are expressed, by convention, as an equivalent concentration of molecular chlorine.

SPECIAL CONDITION 7. For the purpose of this permit, this discharge is limited to superpulsator blowdown, filter backwash, and superpulsator cleaning waters, free from any other wastewater discharges. In the event that the permittee shall require the use of water treatment additives other than those previously approved by this Agency, the permittee must request a modification of this permit in accordance with the Standard Conditions – Attachment H.

SPECIAL CONDITION 8. Construction of treatment facilities which may be necessary to meet the requirements of this permit may not be started until a construction permit has been issued by this Agency.

SPECIAL CONDITION 9. Total Suspended Solids and Iron (total) shall be reported in mg/l and lbs/day for both monthly average and daily maximum.

SPECIAL CONDITION 10.

Total Suspended Solids and Total Iron:

In accordance with Illinois Pollution Control Board (IPCB) adjusted standard AS 07-2, the discharges at Outfall 002 shall not be subject to the effluent standards for Total Suspended Solids and Total Iron at Title 35. Ill. Adm. Code 304.124 and offensive discharges at Title 35 Ill. Adm. Code 304.106.

Special Conditions

1. AS 07-2 will expire if any of the following events occur:
 - A. The Board determines, in an enforcement action under Title VIII of the Act, or in any proceeding brought by the parties to terminate the adjusted standard, that the conditions of the Mississippi River have changed to make the adjusted standard obsolete or infeasible;
 - B. The average offset for the calendar year in question and the four preceding calendar years fails to reach a 2 to 1 offset for total suspended solids as a result of a change in the conditions of the Mississippi River, increased capacity of this facility, or for any other reason; or
 - C. The savings of the Piasa Creek Watershed Project is reduced to below 6,600 tons of soil per year.
 - D. In the event that any of the above events occur, IPCB AS 07-2 will expire upon the date that is three years from the occurrence of such event. The permittee may petition the IPCB for a new adjusted standard, and may include a request for delay of the expiration of this adjusted standard.
 - E. In the event that IPCB AS 07-2 expires due to the events noted above and a new adjusted standard or variance has not been issued, the effluent standards for Total Suspended Solids (15 mg/L for 30-day average and 30 mg/L for daily maximum) and Total Iron (2.0 mg/L for 30-day average and 4.0 mg/L for daily maximum) at Title 35. Ill. Adm. Code 304.124 and offensive discharges at Title 35 Ill. Adm. Code 304.106 will become effective immediately.
 - F. Notwithstanding any other terms of IPCB AS 07-2, if new state or federal regulations are promulgated that limit or prohibit the permittee's discharge to the Mississippi River or otherwise conflict with IPCB AS 07-2, the permittee will be bound by any such regulations, and IPCB AS 07-2 terminates on the compliance date of the new regulations. The Agency or the permittee may petition the Board for modification or termination of IPCB AS 07-2, including authorization for the permittee to terminate any contracts entered pursuant to IPCB AS 07-2.
2. Compliance Conditions:
 - A. The permittee must send all discharges from the Alton facility only to the Mississippi River at River Mile 204. The permittee must not send discharges from the Alton facility to tributaries of the Mississippi River, to any other body of water, or to land.
 - B. The permittee must comply with the terms of both the "Consulting and Performance Agreement" and the "Sedimentation Control Agreement and Piasa Creek Sedimentation Control Maintenance Project" entered between the permittee and GRLT which became effective January 1, 2011.
 - C. If the permittee determines that the amount of solids in the Outfall 002 discharge is likely to exceed 3,300 tons per year, then the permittee may need to enter into a contract or contracts for additional soil savings to ensure that the 2 to 1 offset ratio is achieved. Any additional contract shall be subject to Agency approval.
 - D. In the event that any of the contracts entered into are terminated by either party, or the permittee determines that entry into a substitute or additional contract for maintenance is necessary or desirable, the permittee may enter into a contract for maintenance of the Piasa Creek Watershed Project with a person or entity selected by the permittee and approved by the Agency.
 - E. The permittee, through GRLT or any other individual, entity, or organization that the permittee has entered into a contract with to provide sedimentation reduction, shall submit an annual report to the Agency by the 15th day of January. The report shall include the total reductions achieved by implementation of the sediment reduction measures and describe the sediment load reductions achieved for each measure or practice implemented. For the purposes of this permit, sediment reduction quantification shall be determined by measuring sediment input reductions into the Piasa Creek through the sediment input reduction analysis method (SIRAM) and also measure stream bank erosion and sediments trapped through silt basins, ponds, or lakes. Calculations used to determine sediment reductions shall be submitted with the annual report.
 - i. Quantification: For the purposes of this permit, sediment reduction quantification shall be determined by measuring sediment input reductions into the Piasa Creek through the sediment input reduction analysis method (SIRAM) and also measure stream bank erosion and sediments trapped through silt basins, ponds, or lakes. For purposes of the SIRAM, stream bank erosion areas shall be identified. All calculations will be based on United States Department of Agriculture (USDA) standards, including Universal Soil Loss Equation (USLE) and Revised Universal Soil Loss Equation (RUSLE).
 - ii. Measurements shall be taken in accordance with the U.S. Department of Agriculture's standard for estimating sediment accumulation in reservoirs, Illinois Engineering Form 10, or any successor form.

Special Conditions

- iii. Upon notification to the permittee, the Agency may at any time require a different method of measurement or model to quantify sediment reductions.
 - iv. The permittee may request alternate methods of measurement or alternate means of quantifying sediment reductions by submitting a written request to the Agency. Agency approval is required prior to the permittee using alternate methods of measurement or alternate means of quantifying sediment reductions.
 - F. Within ten (10) days of entering into any such contract for maintenance, the permittee must provide a copy of the contract to the Agency.
3. Submission of Reports. The annual report noted in Part 2.E. of this condition shall be submitted to the Agency by January 15th of each year. All reports and notifications required by this condition shall be submitted to the Agency at the following addresses:

Illinois Environmental Protection Agency
Division of Water Pollution Control
Non-Point Source Management Program
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Illinois Environmental Protection Agency
Division of Water Pollution Control
Compliance Assurance Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Illinois Environmental Protection Agency
Division of Water Pollution Control
Permit Section
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276